UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

In re: John D. Cook, : Chapter 13

Debtor

:

Specialized Loan Servicing LLC

As servicer for PROF-2013-S3 : Case No. 18-02392 RNO

Legal Title Trust, by U.S. Bank:

National Association, as Legal :

Title Trustee

Movant

11 U.S.C. Section 362 and 1301(c)

Vs. :

:

John D. Cook,

:

Frances E. Cook
Co-Debtor

Debtor

.

Charles J. DeHart, III, Esq.

Trustee :

ANSWER OF DEBTOR TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY

AND NOW comes your Debtor, John D. Cook, by and through his counsel, Aaron J. Neuharth, Esquire and Answers Movant's Motion For Relief From Automatic Stay as follows:

- 1. Admitted. By way of further answer, it is believed by the debtor that Movant is who they state they are, and that they have the authority to move on behalf of the mortgage company pursuant to their stated Certificate of Trustee.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Admitted. By way of further answer, Debtor desires to bring said payments current.
- 8. Admitted.
- 9. Admitted.

Wherefore, Respondent respectfully requests this Honorable Court deny Movant's Motion.

Date: December 13, 2018 /s/ Aaron J. Neuharth

> Aaron J. Neuharth Attorney for Debtors Supreme Ct. No.: 88625 PO Box 359 Chambersburg, PA 17201

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